THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: Ewell Wallace)	
) Case No:	17 B 10238
) Judge:	Thorne
) Chapter	13
Debtor)	

NOTICE OF MOTION

Served upon the following parties electronically:

Office of United States Trustee, Dirksen Federal Building, 219 S. Dearborn St., Room 873, Chicago, IL 60604

Trustee: Marilyn O. Marshall, 224 S. Michigan, Suite 800, Chicago, IL 60604

and served upon the following parties via U.S. Mail:

Debtor: Ewell Wallace., 8844 S. Aberdeen St, Chicago, IL 60620

See attached service list.

PLEASE TAKE NOTICE that on <u>September 1, 2021 at 1:30PM</u>. I will appear before the Honorable Judge Thorne or any judge sitting in that judge's place, and present the <u>Motion to Modify Plan</u>, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: https://www.zoomgov.com. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID.

Meeting ID and passcode. The meeting ID for this hearing is 160 9362 1728 – no password required. The meeting ID and further information can also be found on Judge Thorne's web page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: <u>/s/ Angelica Harb</u> Angelica Harb Law Office of Jason Blust, LLC 211 W. Wacker Dr, Suite 300 Chicago, IL 60606 angieharb@clientfirstbankruptcy.com 312-273-5001

CERTIFICATE OF SERVICE

I, Angelica Harb, an attorney, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on August 11, 2021, before 6:00PM.

Case 17-10238 Label Matrix for local noticing 0752-1 Case 17-10238 Northern District of Illinois Eastern Division Mon Aug 9 15:17:31 CDT 2021 American Credit Acceptance

961 E Main St Spartanburg, SC 29302-2185

City of Chicago Dept. of Water Mgt. Department of Water Management 333 S State St, Lower Level Room 10 Chicago, IL 60604-3900

Comcast Cable PO Box 3002 Southeastern, PA 19398-3002

Cook County Clerk 118 N. Clark Street, 4th Floor Chicago, IL 60602-1413

Fed Loan Serv Po Box 60610 Harrisburg, PA 17106-0610

Katrina Bridges-Lucas 9319 S. Prairie Chicago, IL 60619-7217

PEOPLES GAS LIGHT & COKE COMPANY 200 EAST RANDOLPH STREET CHICAGO, ILLINOIS 60601-6433

Sabre Investments 120 W. Madison Street Chicago, IL 60602-4157

U.S. Department of Education C/O FedLoan Servicing P.O. Box 69184 Harrisburg, PA 17106-9184

Filed 08/11/21 Entered 08/11/21 16:13:41 Desc Main Doc 36 of 6 Specifical at 1997 (a) 1997 (b) 1997 (c) 1997 (d) 19 SAINT CLOUD MN 56302-7999

> City of Chicago Department of Finance Bureau of Utility Billing and Customer Service Post Office Box 6330 Chicago, Illinois - IL 60680-6330

Dept of Revenue PO Box 88292 Chicago, IL 60680-1292

City of Chicago Parking

Commonwealth Edison Company Attn: Bankruptcy Department 1919 Swift Drive Oakbrook Terrace, IL 60523-1502

Cook County Treasurer 118 N Clark St Room 112 Chicago, IL 60602-1590

Il Dept Of Healthcare 509 South 6th Street Springfield, IL 62701-1809

LVNV Funding, LLC/ North Star Capital Acquisition LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587

Peoples Gas 130 E Randolph Dr Chicago, IL 60601-6207

Stellar Recovery Inc 1327 Highway 2 West Kalispell, MT 59901-3432

(p) US BANK PO BOX 5229 CINCINNATI OH 45201-5229 Eastern Division 219 S Dearborn 7th Floor Chicago, IL 60604-1702

City of Chicago Department of Finance c/o Arnold Scott Harris P.C. 111 W. Jackson Blvd Ste.600 Chicago, IL 60604-3517

Com Ed Customer Care Center PO Box 805379 Chicago, IL 60680-4179

Convergent 800 Sw 39th St Renton, WA 98057-4927

Cynthia Edwards 4117 Sumter Drive Matteson, IL 60443-2621

(p) ILLINOIS DEPARTMENT OF REVENUE BANKRUPTCY UNIT PO BOX 19035 SPRINGFIELD IL 62794-9035

Med Busi Bur 1460 Renaissance D Park Ridge, IL 60068-1349

Physiotherapy Associates 2930 S Michigan Ave #107 Chicago, IL 60616-3270

The Northern Trust Company PO Box 92963 Chicago, IL 60675-2963

Us Dep Ed Po Box 5609 Greenville, TX 75403-5609 Case 17-10238
Us Dept Of Education
Po Box 5609

Greenville, TX 75403-5609

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180 North LaSalle

Law Office of Jason Blust.

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Ewell L Wallace 8844 S. Aberdeen St. Chicago, IL 60620-3440 Jason Blust
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Ste. 900B
Chicago, IL 60606-1217

Marilyn O Marshall 224 South Michigan Ste 800 Chicago, IL 60604-2503

Patrick S Layng Office of the U.S. Trustee, Region 11 219 S Dearborn St Room 873 Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Jefferson Capital Systems, LLC PO Box 7999 St Cloud, MN 56302-9617 Illinois Department of Revenue P.O. Box 19035 Springfield, IL 62794 (d) JEFFERSON CAPITAL SYSTEMS LLC PO Box 7999 St Cloud MN 56302

US Bank 800 Nicollet Mall Minneapolis, MN 55402 End of Label Matrix
Mailable recipients 36
Bypassed recipients 0
Total 36

IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: Ewell Wallace)	
) Case No	: 17 B 10238
) Judge:	Thorne
) Chapter	13
Debtor)	

MOTION TO MODIFY PLAN

Now comes Ewell Wallace (hereinafter referred to as "Debtors"), by and through his attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

- 1. On March 31, 2017, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
- This Honorable Court confirmed the Debtor's Chapter 13 plan on May 31,
 The confirmed plan called for payments of \$755.00 for 60 months, paying unsecured creditors 100% on their claims.
- 3. Debtor's attorney filed a motion to authorize Met Life Insurance to distribute insurance proceeds scheduled for August 18, 2021 stemming from Debtor's total loss accident involving his 2005 Jeep Grand Cherokee. Met Life Insurance intends to pay Jefferson Capital Systems in the amount of \$129.83 to pay their remaining claim in full.
- 4. The Debtor respectfully requests that the Trustee no longer disburse any funds to Jefferson Capital Systems as their claim will be paid in full by Met Life Insurance.

WHEREFORE, Debtor prays that this Honorable Court enter an Order for the following relief:

- 1. The Trustee shall not make any further payments to Jefferson Capital Systems;
- 2. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

/s/ Angelica Harb
Angelica Harb
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606
312-273-5001